

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

KEITH RANIERE,

Defendant.

Case No. 1:18-cr-00204-NGG-VMS

**NOTICE OF ERRATA RE MOTION FOR
JUDICIAL DISQUALIFICATION**

Submitted on May 6, 2022

NOTICE OF ERRATA

On May 6, 2022, Defendant Keith Raniere, by and through his counsel Joseph M. Tully, filed a Motion for the Recusal /Judicial Disqualification of Judge Nicolas G. Garaufis, Pursuant to 28 U.S.C. § 445. Due to an oversite, both the notice of said motion and the memorandum of law in support thereof incorrectly indicate that they were submitted on May 5, 2022. The Defense hereby submit corrected copies of the relevant pages of Document 1170, page 21506, and Document 1171, page 21507, attached hereto as Exhibit A and B, respectively, to correct this inadvertent clerical error.

Dated: May 6, 2022
Martinez, CA

Respectfully submitted,

/s/Joseph M. Tully
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TO: AUSA Tanya Haajjar
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Eastern District of New York
271-A Cadman Plaza E.
Brooklyn, NY 1120

EXHIBIT A

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

KEITH RANIERE,

Defendant.

Case No. 1:18-cr-00204-NGG-VMS

**NOTICE OF MOTION FOR JUDICIAL
DISQUALIFICATION**

ORAL ARGUMENT REQUESTED

Submitted on May 6, 2022

PLEASE TAKE NOTICE that Mr. Keith Raniere, by and through his undersigned counsel, Joseph M. Tully, will move pursuant to 28 U.S.C. § 445 that Judge Nicolas G. Garaufis, United States District Judge for the Eastern District of New York, disqualify himself from any further proceedings in this case (1) because his impartiality may reasonably be questioned and (2) because Mr. Raniere's Fifth and Fourteenth Amendment rights to a fair trial before an unbiased, impartial tribunal have not been waived.

Dated: May 5, 2022
Martinez, CA

Respectfully submitted,

/s/Joseph M. Tully

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TO: AUSA Tanya Haajjar
United States Attorney's Office
Eastern District of New York
271-A Cadman Plaza E.
Brooklyn, NY 11201

EXHIBIT B

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

KEITH RANIERE,

Defendant.

Case No. 1:18-cr-00204-NGG-VMS

ORAL ARGUMENT REQUESTED

Submitted on May 6, 2022

**MEMORANDUM OF LAW IN SUPPORT OF
KEITH RANIERE'S MOTION FOR JUDGE NICHOLAS G. GARAUFIS
TO DISQUALIFY HIMSELF PURSUANT TO 28 U.S.C. § 445**

Dated: May 5, 2022

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